

EXHIBIT C

From: [Folly, Nicholas \(USANYS\)](#)
To: [Murray, Juliana \(USANYS\) 1](#)
Subject: FW: Mark Scott: 3500 Material
Date: Thursday, January 27, 2022 4:11:05 PM
Attachments: [2019.11.14 \[176 0\] Letter from A. Devlin-Brown regarding Defense Exhibits 550 and 552.pdf](#)

From: Devlin-Brown, Arlo <adevlin-brown@cov.com>
Sent: Thursday, September 30, 2021 5:10 PM
To: Folly, Nicholas (USANYS) <NFolly@usa.doj.gov>; McGinnis, Michael (USANYS) <MMcGinnis@usa.doj.gov>
Cc: Stanley, Katri A <KStanley@cov.com>; David Garvin <dgarvin@garvin.law>; DiMase, Christopher (USANYS) <CDiMase@usa.doj.gov>; Levine, Robert (USANYS) [Contractor] <RLevine1@usa.doj.gov>
Subject: [EXTERNAL] RE: Mark Scott: 3500 Material

Nick,

Thank you. We will file a letter with the Court proposing that date tonight or tomorrow.

With respect to your requests, we will share more when we are in a position to do so, hopefully sooner rather than later. On Dilkinska, there may be other evidence the Government has access to tending to show she was not in Sofia / was in India. If the Government ever obtained access to her email account(s), or computers/servers she used, there may be calendar entries or e-mails similar to those we referenced in the motion (attaching). There may also be border control records in India showing she entered the country on the 19th and left of the 22nd, and perhaps a border control record from the country she flew back to on the 22nd (we don't know that country, but will share if we find out). There could also be credit card or travel records reflecting the trip.

On the laptop, I think I we will be able to get more detail and share it with you soon.

Regards,

Arlo

From: Folly, Nicholas (USANYS) <Nicholas.Folly@usdoj.gov>
Sent: Thursday, September 30, 2021 12:49 PM
To: Devlin-Brown, Arlo <adevlin-brown@cov.com>; McGinnis, Michael (USANYS) <Michael.McGinnis@usdoj.gov>
Cc: Stanley, Katri A <KStanley@cov.com>; David Garvin <dgarvin@garvin.law>; DiMase, Christopher (USANYS) <Christopher.DiMase@usdoj.gov>; Levine, Robert (USANYS) [Contractor] <Robert.Levine2@usdoj.gov>
Subject: RE: Mark Scott: 3500 Material

[EXTERNAL]

Arlo,

We consent to a deadline of October 15, 2021 for your reply brief. Separately, in an effort to further investigate the allegations you raised during our call yesterday, we request that you provide us with: 1) the records you referenced on the call showing that Dilkinska was in India at the time of the meeting with Scott; and 2) any information you have regarding the contents that were on the laptop.

Thanks,
Nick

-----Original Message-----

From: Devlin-Brown, Arlo <adevlin-brown@cov.com>
Sent: Tuesday, September 28, 2021 5:13 PM
To: McGinnis, Michael (USANYS) <MMcGinnis@usa.doj.gov>; Folly, Nicholas (USANYS) <NFolly@usa.doj.gov>
Cc: Stanley, Katri A <KStanley@cov.com>; David Garvin <dgarvin@garvin.law>; DiMase, Christopher (USANYS) <CDiMase@usa.doj.gov>; Levine, Robert (USANYS) [Contractor] <RLevine1@usa.doj.gov>
Subject: [EXTERNAL] RE: Mark Scott: 3500 Material

Mike,

Can you, Chris and Nick do a call with us sometime between 3 and 4 tomorrow? Further information has been brought to our attention in the last day that factors into our assessment on timing and we wanted to have an initial conversation with you on this.

Best, Arlo

-----Original Message-----

From: McGinnis, Michael (USANYS) <Michael.McGinnis@usdoj.gov>
Sent: Monday, September 27, 2021 3:27 PM
To: Devlin-Brown, Arlo <adevlin-brown@cov.com>; Folly, Nicholas (USANYS) <Nicholas.Folly@usdoj.gov>
Cc: Stanley, Katri A <KStanley@cov.com>; David Garvin <dgarvin@garvin.law>; DiMase, Christopher (USANYS) <Christopher.DiMase@usdoj.gov>; Levine, Robert (USANYS) [Contractor] <Robert.Levine2@usdoj.gov>
Subject: RE: Mark Scott: 3500 Material

[EXTERNAL]

Arlo:

1) To our knowledge, there is no copy of the laptop that exists; and

2) The U.S. is not in possession of the boxes provided by Duncan Arthur. Should we come into possession of the boxes, we will produce them consistent with our discovery obligations.

For purposes of scheduling, when do you anticipate filing your reply? Happy to discuss by phone if that makes more sense. Thank you.

Regards,

Mike

-----Original Message-----

From: Devlin-Brown, Arlo <adevlin-brown@cov.com>

Sent: Monday, September 27, 2021 12:20 PM

To: McGinnis, Michael (USANYS) <MMcGinnis@usa.doj.gov>; Folly, Nicholas (USANYS) <NFolly@usa.doj.gov>

Cc: Stanley, Katri A <KStanley@cov.com>; David Garvin <dgarvin@garvin.law>; DiMase, Christopher (USANYS) <CDiMase@usa.doj.gov>; Levine, Robert (USANYS) [Contractor] <RLevine1@usa.doj.gov>

Subject: [EXTERNAL] RE: Mark Scott: 3500 Material

Michael,

Thank you. Two quick questions.

First, can you confirm (which seems pretty clear from your motion / the 3500) that the laptop at issue was never reviewed or imaged by law enforcement / that no copy of the laptop exists to your knowledge?

Second, some of that material in the boxes provided by Mr. Arthur appears to be relevant. What is status of the transfer of the boxes to the U.S. and would it be possible for us to review the contents or, alternatively, certain items described in the index?

Regards,

Arlo

-----Original Message-----

From: McGinnis, Michael (USANYS) <Michael.McGinnis@usdoj.gov>

Sent: Wednesday, September 22, 2021 9:10 PM

To: Devlin-Brown, Arlo <adevlin-brown@cov.com>; Folly, Nicholas (USANYS) <Nicholas.Folly@usdoj.gov>

Cc: Stanley, Katri A <KStanley@cov.com>; David Garvin <dgarvin@garvin.law>; DiMase, Christopher (USANYS) <Christopher.DiMase@usdoj.gov>; Levine, Robert (USANYS) [Contractor] <Robert.Levine2@usdoj.gov>

Subject: RE: Mark Scott: 3500 Material

[EXTERNAL]

Arlo --- Following up on our call from last week, we wanted to provide some additional information and materials consistent with your request.

- 1) We previously produced to you notes and an interview report from an interview conducted on March 6, 2019 of Duncan Arthur. See 3525-001 and 002. The interview report references documents provided by Arthur to law enforcement. We will be producing the documents as 3535-018 and 019 via USAfx, which our paralegal will produce under separate cover.
- 2) Agent Shimko has had no communications with Arthur at any point.
- 3) Investigator Winters is an investigator for the New York County District Attorney's Office. He was seconded to the City of London Police. As part of the investigation, his role was to assist in coordinating and liaising between United States law enforcement and City of London Police.
- 4) During our meeting with Konstantin Ignatov following the filing of your motion, we informed him that his cooperation agreement is in jeopardy and that he was obligated under his cooperation agreement to provide truthful information.

Regards,

Mike

Michael McGinnis
Assistant United States Attorney
Southern District of New York

-----Original Message-----

From: Devlin-Brown, Arlo <adevlin-brown@cov.com>
Sent: Wednesday, September 15, 2021 10:12 AM
To: Folly, Nicholas (USANYS) <NFolly@usa.doj.gov>
Cc: Stanley, Katri A <KStanley@cov.com>; David Garvin <dgarvin@garvin.law>; DiMase, Christopher (USANYS) <CDiMase@usa.doj.gov>; McGinnis, Michael (USANYS) <MMcGinnis@usa.doj.gov>; Levine, Robert (USANYS) [Contractor] <RLevine1@usa.doj.gov>
Subject: Re: Mark Scott: 3500 Material

Can you do a call after 4:30 today or at 10:30 tomorrow to discuss scheduling and a few other issues?

Thanks

Arlo

On Sep 14, 2021, at 7:04 PM, Folly, Nicholas (USANYS) <Nicholas.Folly@usdoj.gov> wrote:

[EXTERNAL]

Arlo,

Please see the attached underlying notes for the last production of Ignatov 3500 material that was produced to you last week in memorandum form.

Best,

Nick

From: Folly, Nicholas (USANYS)

Sent: Friday, September 10, 2021 12:02 PM

To: Devlin-Brown, Arlo <adevlin-brown@cov.com>; Stanley, Katri A <KStanley@cov.com>; David Garvin <dgarvin@garvin.law>

Cc: DiMase, Christopher (USANYS) <CDiMase@usa.doj.gov>; McGinnis, Michael (USANYS) <MMcGinnis@usa.doj.gov>; Levine, Robert (USANYS) [Contractor] <RLevine1@usa.doj.gov>

Subject: RE: Mark Scott: 3500 Material

Arlo,

Please see the attached 3500 for Ignatov.

Best,

Nick

From: Folly, Nicholas (USANYS)

Sent: Tuesday, August 31, 2021 5:50 PM

To: Devlin-Brown, Arlo <adevlin-brown@cov.com<<mailto:adevlin-brown@cov.com>>>; Stanley, Katri A <KStanley@cov.com<<mailto:KStanley@cov.com>>>; David Garvin <dgarvin@garvin.law<<mailto:dgarvin@garvin.law>>>

Cc: DiMase, Christopher (USANYS) <CDiMase@usa.doj.gov<<mailto:CDiMase@usa.doj.gov>>>; McGinnis, Michael (USANYS) <MMcGinnis@usa.doj.gov<<mailto:MMcGinnis@usa.doj.gov>>>; Levine, Robert (USANYS) [Contractor] <RLevine1@usa.doj.gov<<mailto:RLevine1@usa.doj.gov>>>

Subject: RE: Mark Scott: 3500 Material

Arlo,

Attached please find certain additional material related to Duncan Arthur, as well as the 302 reports for the handwritten interview notes we produced to you last week. We are again producing these materials to you pursuant to the terms of the protective order governing 3500 material in this case.

Best,

Nick

From: Folly, Nicholas (USANYS)

Sent: Wednesday, August 25, 2021 5:54 PM

To: Devlin-Brown, Arlo <adevlin-brown@cov.com<<mailto:adevlin-brown@cov.com>>>; Stanley, Katri A <KStanley@cov.com<<mailto:KStanley@cov.com>>>; David Garvin <dgarvin@garvin.law<<mailto:dgarvin@garvin.law>>>

Cc: DiMase, Christopher (USANYS) <CDiMase@usa.doj.gov<<mailto:CDiMase@usa.doj.gov>>>;

McGinnis, Michael (USANYS) <MMcGinnis@usa.doj.gov<<mailto:MMcGinnis@usa.doj.gov>>>

Subject: Mark Scott: 3500 Material

Arlo,

Attached please find a set of 3500 material related to the laptop issue raised in your supplemental Rule 33 motion. We are producing these materials pursuant to the protective order governing 3500 material in this case.

Best,
Nick

Nicholas S. Folly
Assistant United States Attorney
Southern District of New York
One St. Andrew's Plaza
New York, NY 10007
Tel: 212-637-1060
Email: nicholas.folly@usdoj.gov<<mailto:nicholas.folly@usdoj.gov>>

<3524-066.pdf>